



52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008

614.464.6400 | vorys.com

Founded 1909

William D. Kloss Jr.
Direct Dial (614) 464-6360
Direct Fax (614) 464-6360
Email wdklossjr@vorys.com

July 26, 2023

VIA PRIORITY MAIL

Butler County Jail
Attn: Brinson Caleb Silver, Inmate #303850
705 Hanover Street
Hamilton, Ohio 45011

Re: *Root, Inc., et al. v. Brinson Caleb Silver, et al.*

Dear Mr. Silver:

I write regarding your responses to Root's discovery requests in the above matter. Your responses were served on June 16, 2023, by your prior counsel, Matt Jalandoni. Please consider this my effort to resolve a discovery dispute without involving the Court as required by S.D. Ohio Civ. R. 37.1.

While there are numerous deficiencies in your responses to the interrogatories, requests for admission, and document requests, it is difficult to determine the full scope of the issues at this point. That is because you have failed to produce any documents whatsoever. Only after the documents are received and reviewed can I address all of the deficiencies that remain to be resolved, if any. But without the documents that is not possible.

I previously raised this issue with your counsel, Ben Reese and Matt Jalandoni, by email on June 16, 2023. A copy of my email and Mr. Jalandoni's June 19, 2023, email response is attached. I also wrote Mr. Jalandoni a letter on June 19, 2023, which is also attached. While I understand that Mr. Jalandoni is no longer your counsel, the discovery obligations continue and the issues related therewith continue to be unresolved.

This is my final effort to resolve this issue before I seek assistance from the Court. Please produce the documents immediately. If I do not receive a full production by August 11, 2023, I will seek the Court's assistance.

Very truly yours,

William D. Kloss Jr.

WDK/jlm
Enclosures